

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN THE MATTER OF:

CHAPTER 13 NO:

John Earl Jones

22-00638-JAW

NOTICE OF MOTION TO MODIFY

Should any party receiving this notice respond or object to said motion, such response or objection is required to be filed within 30 days, using the CM/ECF system or with the Clerk of this Court at the following address:

Danny L. Miller, Clerk of Court
U. S. Bankruptcy Court Southern District of Mississippi
501 E. Court St., Ste 2.300
Jackson, MS 39201

and a copy must be served on the undersigned Chapter 13 Trustee. If no responses are filed, the Court may consider said motion immediately after the time has expired. In the event a written response is filed, the Court will notify you of the date, time and place of the hearing thereon.

CERTIFICATE

I, the undersigned attorney for the Debtor, do hereby certify that I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, and I hereby certify that I either mailed by United States Postal Service, first class, postage prepaid, or electronically notified through the CM/ECF system, a copy of the above and foregoing to the Trustee, the United States Trustee, and other parties in interest, if any, as identified below.

Case Trustee
James L. Henley, Jr.

Mississippi Title Loans, Inc.
8601 Dunwoody Place Ste. 406
Atlanta, GA 30350

LVNV Funding, LLC
Resurgent Capital Services
P O Box 10587
Greenville, SC 29603

United States Trustee

NewRez, LLC
d/b/a Shellpoint Mortgage
P O Box 10826
Greenville, SC 29603

Dated: July 15, 2022

/s/ G. Adam Sanford

G. Adam Sanford

G. Adam Sanford, MSB No. 103482
Allison W. Killebrew, MSB No. 102431
McRANEY & McRANEY
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**IN THE MATTER OF:
John Earl Jones**

**CHAPTER 13 NO:
22-00638-JAW**

MOTION TO MODIFY

COMES NOW Debtor, by and through counsel, and files this Motion to Modify. **The recipient(s) of this motion have 30 days, subject to Fed. R. Bankr. P. 9006(f), in which to file a response or objection.** In support of this motion, Debtor states as follows:

1. Debtor filed a petition for relief under chapter 13 of the Bankruptcy Code on March 31, 2022.
2. Mississippi TitleMax filed a claim in the amount of \$2,554.94 that is secured by a 2010 Cheverolet Silverado.
3. Debtor request for his plan to be modified to include a provision to pay the claim of Mississippi TitleMax the amount owed \$2,554.94 plus *Till* interest with the trustee to determine the plan payment.

WHEREFORE, PREMISES CONSIDERED, Debtor prays that this Court will enter its order granting Debtor's motion and for such other relief to which Debtor may be entitled.

Dated: July 15, 2022

Respectfully submitted,
John Jones

By: /s/ G. Adam Sanford
G. Adam Sanford

Prepared by:
G. Adam Sanford, MSB No. 103482
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CERTIFICATE OF SERVICE

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/s/ G. Adam Sanford
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